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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	
In re	: Chapter 11
	:
MOTORS LIQUIDATION COMPANY,	: Case No. 09-50026 (MG)
	:
Debtor.	:
-----X	

**JOINDER OF GROMAN PLAINTIFFS TO MOTION FOR AN ORDER GRANTING  
AUTHORITY TO FILE LATE CLASS PROOFS OF CLAIM**

Dr. Steven Groman, Robin DeLuco, Elizabeth Y. Grumet, ABC Flooring, Inc., Marcus Sullivan, Katelyn Saxson, Amy C. Clinton, and Allison C. Clinton, each individually and as a putative class representative on behalf of all similarly situated persons (collectively, the “**Groman Plaintiffs**”), by and through their undersigned counsel, hereby join in the *Motion for an Order Granting Authority to File Late Class Proofs of Claim* [Dkt. No. 13806] (the “**Motion**”) as follows:

1. The Groman Plaintiffs are “Ignition Switch Plaintiffs” (as defined in the Motion) and have commenced an action against General Motors LLC (“**New GM**”) in United States District Court.

2. Additionally, on or about April 21, 2014, the Groman Plaintiffs commenced an adversary proceeding against GM in this Court asserting a violation of due process and fraud on

the court, which is known as *Groman v. General Motors LLC*, Adv. Pro. No. 14-01929 (the “**Adversary Proceeding**”).

3. The Groman Plaintiffs join in the Motion solely with respect to the proposed proof of claim to be filed on behalf of Ignition Switch Plaintiffs, which is annexed as Exhibit A to the Motion.

4. The Groman Plaintiffs reserve all rights, including, but not limited to, with respect to the Adversary Proceeding.

Dated: New York, New York  
January 4, 2017

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